

# **EXHIBIT B**

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**From:** Ingrisano, Jonathan  
**Sent:** Friday, July 15, 2022 11:47 AM  
**To:** Sarah A. Zylstra  
**Cc:** Tanner G. Jean-Louis; Noel Sterett  
**Subject:** Call Follow-Up [GK-Active.FID3018047]

Sarah:

Thank you for the call today.

The Defendants have identified Ms. VanderSanden, Sr. Phelan, and Ms. Balisteri-Clarke as intended deponents. The Plaintiffs intend to depose the UW and Tim Parks. We have tentatively blocked off August 10, 11, 16, 17, and 18 for these depositions. I will be confirm Sr. Phelan's availability while you confirm Mr. Parks'. We can talk further when you return from vacation after next week.

I raised the issue of potential privileged documents in the anticipated third party productions by Vandewalle and Wood. My intention is to work with these subpoenaed parties to pre-screen their production for privilege. Please confirm that you have no objection to this process, which will not be taken as a waiver of any objection by the Defendants to an assertion of privilege.

Lastly, I raised the issue of John Strange's communications in 2019. I don't believe that many communications to or from Mr. Strange have been produced. We are asking the City to revisit that issue, particularly for communications from the January through March 2019 and July through August 2019 timeframes. You were going to look into this request and we can discuss further upon your return.

Jonathan

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